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OFFICE OF THE  
EXECUTIVE SECRETARY

Via Overnight Delivery

28 February 2002

Mr. David Waddell  
Executive Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

RE: Petition of Tennessee UNE-P Coalition to open contested case proceeding  
to declare unbundled switching an unrestricted unbundled network  
element. Docket No. 02-00207

Dear Mr. Allen,

Please find enclosed an original and thirteen (13) copies of the *Petition to Intervene of the Association of Communications Enterprises* regarding the above-referenced proceeding.

Questions should be directed to the undersigned.

Sincerely,

Association of Communications Enterprises

  
Andrew O. Isar

enclosures

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:        PETITION OF TENNESSEE UNE-P COALITION TO OPEN CONTESTED  
              CASE PROCEEDING TO DECLARE UNBUNDLED SWITCHING AN  
              UNRESTRICTED UNBUNDLED NETWORK ELEMENT, DOCKET NO. 02-  
              00207**

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**PETITION TO INTERVENE OF THE ASSOCIATION OF COMMUNICATIONS  
ENTERPRISES**

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The Association of Communications Enterprises ("ASCENT"), on behalf of its members and pursuant to Tennessee Regulatory Authority Rules, hereby respectfully petitions the Tennessee Regulatory Authority for leave to intervene in the above-captioned proceeding. In support of its application, ASCENT submits the following:

1. ASCENT is a national industry organization representing more than 500 telecommunications service providers and suppliers throughout the United States. ASCENT's members are generally small to medium-sized telecommunications service providers. ASCENT members offer a variety of value-added competitive local, interexchange, wireless, Internet, and enhanced services to the public. Several ASCENT members are authorized by the Authority to provide competitive local exchange services in the state of Tennessee.
2. ASCENT members have a substantial and material interest in, and will be materially effected by, the petition in the instant proceeding to require BellSouth to provision unbundled local switching as an unbundled network element (UNE). The ability to access unbundled local switching as a UNE will have profound impact upon the ability of such telecommunications service providers to enter the local telecommunications market in Tennessee. There are no other parties to this proceeding who can adequately address the concerns of ASCENT or provide the unique perspective of its membership.

3. A decision by the Authority in this proceeding may have material impact on the competitive position of members of ASCENT and the offerings they can make in competitive markets. ASCENT believes that its participation will assist the development of a sound basis for decision and will in no way interfere with the Authority's ability to conduct an efficient proceeding.

4. ASCENT wishes to intervene for the specific purpose of monitoring this proceeding and submitting comments or briefs, as appropriate. The proposed intervention by ASCENT will not unduly broaden the issues involved in this proceeding or prejudice other parties.

6. The name and address of the individuals to receive documents and communications regarding this proceeding are:

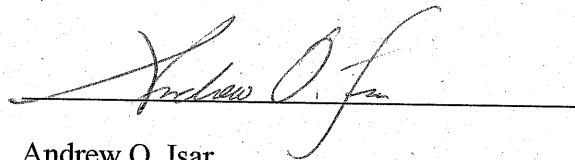
Andrew O. Isar  
Director – State Affairs  
Dena Alo-Colbeck, Esq.  
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Email: [aisar@millerisar.com](mailto:aisar@millerisar.com); [dalocolbeck@millerisar.com](mailto:dalocolbeck@millerisar.com)

WHEREFORE, the Association of Communications Enterprises respectfully requests that the Commission grant its Petition for Leave to Intervene in this proceeding.

Respectfully submitted,

Association of Communications Enterprises

BY:



Andrew O. Isar  
Director – State Affairs  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
Telephone: 253.851.6700  
Facsimile: 253.851.6474

28 February 2002